

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

X CORP., a Nevada corporation,

Plaintiff,

vs.

MEDIA MATTERS FOR AMERICA, a
Washington, D.C. non-profit corporation,
ERIC HANANOKI, and **ANGELO
CARUSONE**,

Defendants.

Case No. 4:23-cv-01175-O

**MOTION TO COMPEL PRODUCTION OF
DOCUMENTS WITHHELD UNDER TEXAS PRESS SHIELD LAW**

Plaintiff X Corp. (“X”) brings this motion to compel the production of documents withheld on the basis of the Texas Press Shield Law, Tex. Civ. Prac. & Rem. Code §§22.021-.027, by Defendants Media Matters for America, Eric Hananoki, and Angelo Carusone. For the reasons stated in the accompanying brief in support, X requests that the Court issue an order overruling any privilege objection asserted by Defendants on the basis of the Texas Press Shield Law, and requiring Defendants to promptly provide responsive documents withheld based on an assertion of privilege under the Texas Press Shield Law. Alternatively, X requests that the Court order Defendants to promptly produce any documents withheld thereunder to the Court for an *in camera* review to determine the applicability of Defendants’ assertions of privilege under the Texas Press Shield Law.

Dated: September 24, 2024

Respectfully submitted,

/s/ Christopher D. Hilton

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CERTIFICATE OF CONFERENCE

I certify that the parties have conferred on multiple occasions, including on July 29, 2024, and August 2, 2024, regarding the issues raised in this motion to compel. Notwithstanding those conferrals, including Plaintiff's provision of its brief in support of this motion to Defendants prior to this filing, there remain intractable grounds of disagreement necessitating this motion.

/s/ Christopher D. Hilton
Christopher D. Hilton

CERTIFICATE OF SERVICE

I hereby certify that on September 24, 2024, a copy of this document was served on all counsel of record through the Court's CM/ECF system in accordance with the Federal Rules of Civil Procedure.

/s/ Christopher D. Hilton
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